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Arthur M. Cromarty,
Ret. N.Y.S. Supreme Ct. Justice
(1919-2014)

MEMO ENDORSED

June 27, 2023

Via ECF

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The request for a 90-day extension of discovery is granted.
The new discovery completion date is October 12, 2023. The
case management conference is adjourned to October 17,
2023 at 3:30 p.m. SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: June 29, 2023
New York, New York

Re: Santos v. 852 Eighth Gotham Pizza Inc. et. al.
Case No. 21-CV-8304 (ER) (KHP)

Dear Judge Ramos:

I represent the Defendants in the above captioned matter. The Plaintiff sought court approval to amend the Complaint to add an individual defendant and add an additional cause of action pursuant to § 191 of the New York Labor Law. Plaintiff's counsel and I entered into a Stipulation indicating that Defendants would not object to both requests.

In view of this additional defendant and claim, Plaintiff's counsel and I have agreed that Defendants should be granted an extension of an additional ninety (90) days to complete Discovery. I now ask the court for its indulgence to allow for that ninety (90) day extension to complete Discovery.

Additionally, there is a Case Management Conference scheduled for July 20, 2023, which is when I will be in Europe and unavailable to appear. My associate, Nicole L. Bohler, who has been working on this case with me and completely familiar with the facts and circumstances of this litigation is admitted to the Eastern District of New York but she has not yet been admitted to the Southern District of New York and I would ask the Court's indulgence to allow her to

appear on my behalf on this upcoming phone conference or adjourn the Case Management Conference to another date in August or September.

Plaintiff's counsel has consented to these requests.

Very truly yours,

/s/ Harold Seligman

Harold Seligman

CC: Plaintiff's counsel *VIA ECF*